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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Amendment of Parts 21, 22, 23)
and 25 of the Commission's Rules)
To Require Reporting of Station)
Frequency and Technical Parameters)
for Registration by the Commission)
with the International Frequency)
Registration Board)

CC Docket No. 92-160

REPLY COMMENTS OF GTE SERVICE CORPORATION

GTE Service Corporation and
its affiliated domestic
telephone, satellite and cellular
companies

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October 28, 1992

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SUMMARY

GTE supports the Commission's goal to improve international frequency coordination, but submits that it should be accomplished with a cost and benefit balance in mind. GTE incorporates by reference the recommendations contained in its initial Comments, and is willing to assist the Commission in any way to accomplish these objectives.

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REPLY COMMENTS OF GTE SERVICE CORPORATION

GTE Service Corporation and its affiliated domestic telephone, satellite and cellular companies ("GTE"), hereby submits their Reply Comments on the above-referenced Notice of Proposed Rulemaking ("NPRM") released July 30, 1992. GTE submitted several recommendations to the Commission in its initial Comments, and these recommendations appear to be highly appropriate in light of Comments submitted by other parties. In addition, the recently completed bilateral coordination agreement between the U.S. and Mexico, which was announced after the release of the NPRM, has raised further questions regarding the underlying need for the extensive information requirements proposed in the NPRM.¹

¹ See FCC Public Notice, In the Matter of U.S.-Mexican Agreement for Coordinating Earth Stations with Terrestrial Fixed Stations in the 6 GHz Band, Report No. DS-1238, released September 25, 1992.

DISCUSSION

I. Industry Consensus Does Not Appear to Support Imposing the Reporting Requirements on Earth Stations That Operate in the 12/14 GHz Band ("Ku-Band")

As GTE noted in its initial Comments, the interference concerns that exist with respect to C-Band operations do not exist in the Ku-Band.² This band is set aside for Fixed Satellite Services ("FSS") in Region II under a primary allocation, and there is no sharing of frequencies with terrestrial services. This view was shared by other parties who noted that interference concerns in the C-Band are not present in Ku-Band operations.³ In particular, there is strong opposition to subjecting the proposed requirements to each very small aperture terminal ("VSAT") that comprises a VSAT system. As Hughes stated, imposing these requirements on individual VSATs "would vitiate the policy rationale adopted by the Commission when it authorized blanket licensing of these networks."⁴ GTE agrees wholeheartedly with this statement and strongly opposes the inclusion of individual VSATs under the proposed requirements. Moreover, given the primacy of Ku-Band FSS services in Region II, GTE reiterates its recommendation that all Ku-Band facilities be excluded from the requirements.

² See Comments of GTE Service Corporation, Docket No. 92-160, filed September 28, 1992.

³ See Comments of Hughes Communications, Inc., Docket 92-160, filed September 28, 1992, at p.3; See also Comments of IDB Communications Group, Inc., Docket 92-160, filed September 28, 1992, at p.6.

⁴ Hughes pages 3-4.

II. The Proposed Database Contains Significantly More Data Elements Than Necessary for Protection of Facilities in Shared Frequency Bands

GTE maintained in its Comments that the data currently used for U.S. domestic frequency coordination is sufficient to accomplish international frequency protection objectives. For earth stations, this data is contained in Attachment 3, files 1 through 5, of the NPRM. The adequacy of this coordination information is evidenced by the U.S.-Mexican bilateral coordination agreement which recently was announced by the Commission.⁵ The Public Notice announcing this agreement contained an Attachment which listed the location and technical parameters for several earth stations in Mexico, and requested U.S. licensees to analyze this data for interference potential into their existing facilities.

Under this arrangement, frequency coordination is accomplished using only the information supplied in the Public Notice. This arrangement therefore appears to support GTE's assertion that the detailed data elements proposed in the NPRM are not essential to perform international frequency coordination for these earth stations.⁶ Moreover, the proposed creation of an extensive satellite database at considerable cost to satellite

⁵ Supra note 1.

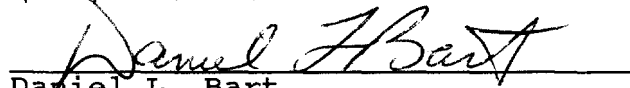
⁶ If, however, the elements are required strictly for IFRB purposes, GTE notes the recommendation in its Comments that the requirements be reviewed for elimination or streamlining within Region II.

carriers does not appear to enhance the Commission's international frequency protection objectives, as the bilateral agreement appears to rely on U.S. licensees to assess interference potential from international facilities. Indeed, if the NPRM is implemented as proposed, U.S. licensees would in effect be subjected to a double expense - once for the preparation of the required information, and a second time to perform coordination analyses to ensure against foreign interference.

Respectfully submitted,

GTE Service Corporation and
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Certificate of Service

I, Jennifer R. McCain, hereby certify that copies of the foregoing "Reply Comments of GTE Service Corporation" have been mailed by first class United States mail, postage prepaid, on the 28th day of October, 1992 to the following parties:

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